

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA  
SCRANTON DIVISION**

THOMAS ROSEMAN,

Plaintiff,

v.

EQUIFAX INFORMATION SERVICES, LLC,

Defendant.

Case No. 3:25-cv-00441-JKM

**CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT  
EQUIFAX INFORMATION SERVICES LLC TO ANSWER OR  
OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT**

Defendant Equifax Information Services, LLC (“Equifax” or “Defendant”), by its counsel and pursuant to Rule 6(b)(1) of the Federal Rules of Civil Procedure, hereby respectfully requests an extension of time, through and including April 7, 2025, to respond to Plaintiff’s Thomas Roseman Complaint, and in support thereof states:

1. On February 3, 2025, Plaintiff filed his Complaint in the Monroe County Court of Common Pleas, titled *Thomas Roseman v. Equifax Information Services, LLC*, Case No. 707-cv-2025. (ECF No. 1-2).
2. Equifax was served via process service on its registered agent, on February 18, 2025.
3. On March 10, 2025, Equifax timely removed this matter from Monroe County Court of Common Pleas to the United States District Court for the Middle District of Pennsylvania. (ECF No. 1).
4. Pursuant to Rule 81(c) of the Federal Rules of Civil Procedure, Equifax must file its responsive pleading by March 17, 2025.

5. Equifax and its counsel require additional time to investigate and respond to the allegations and claims made by Plaintiff. In addition, the parties anticipate discussing settlement prior the Equifax filing its Answer. Accordingly, Equifax respectfully requests an extension of the deadline to respond to Plaintiff's Complaint, up to and including April 7, 2025.

6. This motion is made in good faith, not for purposes of delay, and granting it will not prejudice any party. This extension of time will allow Equifax sufficient time to fully investigate the allegations and claims raised by Plaintiff's Complaint, confer with counsel, and prepare its response. This is Defendant Equifax's first request for an extension of time.

7. On March 12, 2025, Equifax's counsel conferred with Plaintiff's counsel regarding the basis for this request and its need for an extension. Plaintiff's counsel had no objection and provided his assent to the requested extension.

WHEREFORE, Equifax respectfully requests that this Court grant its request for an extension of time to respond to Plaintiff's Complaint, up to and including April 7, 2025.

DATED: March 13, 2025

Respectfully submitted,

CLARK HILL PLC

By: /s/ Vincent M. Roskovensky  
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*Counsel for Defendants*  
*Equifax Information Services LLC*

**CERTIFICATE OF SERVICE**

I hereby certify that on the 13<sup>th</sup> day of March, 2025, I presented the foregoing CONSENT MOTION FOR EXTENSION OF TIME FOR DEFENDANT EQUIFAX INFORMATION SERVICES, LLC TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFF'S COMPLAINT with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to all counsel of record.

*/s/ Vincent M. Roskovensky*

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Vincent M. Roskovensky

*Counsel for Defendant*

*Equifax Information Services LLC*